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April 3, 2019

**VIA EMAIL [KMurphy@MLJfirm.com]**

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Re: *Hernandez v. The Office of the Commissioner of Baseball, et al.*  
No. 18 Civ. 9035 (JPO)

Dear Mr. Murphy:

In connection with Defendants' Responses and Objections to Plaintiff's First Set of Requests for the Production of Documents, we enclose documents bearing control numbers DEF 010814-010831. The enclosed spreadsheets are performance summary documents used in connection with the consideration of umpires for post-season assignments and preparation of year-end performance evaluations, for the following years:

- DEF 010814-15 - 2011
- DEF 010816-17 - 2012
- DEF 010818-19 - 2013
- DEF 010820-21 - 2014
- DEF 010822-23 - 2015
- DEF 010824-25 - 2016
- DEF 010826-28 - 2017
- DEF 010829-31 - 2018

Defendants continue to search for responsive documents and will produce supplemental responsive, non-privileged documents to the extent they are located after a reasonable search. Defendants produce these documents pursuant to their good faith meet and confer efforts with Plaintiff to reach a compromise regarding discovery issues. Nothing herein waives Defendants' objections to any of Plaintiff's document requests.

Additionally, please note that pursuant to the Confidentiality Order entered by the Court on November 28, 2018 (Dkt. 36), the documents in this production are Confidential—Attorneys'

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Kevin L. Murphy, Esq.  
April 3, 2019  
Page 2

Eyes Only and have been designated accordingly. All Confidential—Attorneys' Eyes Only material may only be used in connection with the current litigation and for no other purpose. Additionally, all documents designated Confidential—Attorneys' Eyes Only in the course of discovery in this matter should not be filed without taking appropriate steps, including filing such documents under seal.

Very truly yours,

/s/ Neil H. Abramson

Neil H. Abramson

Attachments

cc: Paul Z. Lewis, Esq.  
Lewis DiBiasi Zaita & Higgins